



FEDERAL ELECTION COMMISSION

WASHINGTON, D C 20463

OCT - 8 2004

Mr. Scott Karem  
Conway for Congress  
2240 Taylorville Road  
Louisville, KY 40205

Dear Mr. Karem:

In the normal course of carrying out its supervisory responsibilities, the Federal Election Commission discovered that Conway for Congress and you, as treasurer, may have accepted prohibited contributions from a labor organization. Specifically, information before the Commission showed that the Kentucky State District Council of Carpenters ("KSDCC") made in-kind contributions and facilitated the making of monetary contributions to Conway for Congress in 2002.


KSDCC made in-kind contributions by requiring its paid employees, known as field representatives, to provide services for Conway for Congress that were directed to the general public. These services may have included posting campaign signs, participating in precinct walks, operating phone banks, distributing handbills, and attending campaign rallies, debates, and press conferences. Field representatives performed these services as part of their official job responsibilities for the union.

KSDCC facilitated monetary contributions to Conway for Congress by requiring field representatives to contribute predetermined amounts of money to Conway for Congress. KSDCC also collected contribution checks from its field representatives, bundled them, and sent them to Conway for Congress in a single package with a cover memo on union stationery listing the employees who contributed and the total amount of their contributions.

The Federal Election Campaign Act, as amended, prohibits any person from knowingly accepting a contribution from a labor organization. See 2 U.S.C. § 441b. The Commission admonishes you that Conway for Congress's actions appear to violate the Act. Conway for Congress and you, as treasurer, should take action to prevent such violations from occurring in the future. If you have any questions, please contact Brant Levine, the attorney assigned to this matter, at (202) 694-1572.

Sincerely,

Lawrence H. Norton  
General Counsel

BY:   
Lawrence L. Calvert Jr.  
Deputy Associate General Counsel for Enforcement